

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

BILLIE RODRIGUEZ, DANIEL ERWIN,
MICHAEL B. ACKERMAN, KYLE FOREMAN,
DREW SCRUGGS, MARY JANE MCQUEENY,
EMILY THORPE, JENNIFER TRITT and THE
BOARD OF COUNTY COMMISSIONERS OF
THE COUNTY OF FORD, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

EXXON MOBIL CORPORATION, CHEVRON
USA INC., CHEVRON PHILLIPS CHEMICAL
CORPORATION, DUPONT de NEMOURS, INC.,
CELANESE CORPORATION, DOW INC.,
DOW CHEMICAL COMPANY, DUPONT
CORPORATION, EASTMAN CHEMICAL
COMPANY, LYONDELLBASELL INDUSTRIES
N.V., and AMERICAN CHEMISTRY COUNCIL,

Defendants,

and

STATE OF KANSAS, *ex rel.*
KRIS W. KOBACH, Attorney General,

Proposed Defendant-Intervenor.

Case No. 4:24-cv-00803-SRB

**[PROPOSED]
MOTION TO EXCEED PAGE LIMITATIONS FOR
KANSAS'S SUPPORTING SUGGESTIONS FOR MOTION TO DISMISS**

COMES NOW, the State of Kansas, *ex rel.* Kris W. Kobach, Attorney General
("Kansas"), respectfully moves under L.R. 7.0(d)(1)(A) for leave to exceed the Court's fifteen
(15) page limit for Kansas's forthcoming supporting suggestions for its motion to dismiss.

Local Rule 7.0(d)(1)(A) limits supporting suggestions to fifteen (15) pages. Kansas seeks to file supporting suggestions for its motion to dismiss that is no more than thirty (30) pages.

The additional pages are necessary to fully address the complex issues raised by Plaintiff The Board of County Commissioners of the County of Ford (“Ford County”)’s joinder to this litigation. (Doc. 48, ¶ 23.) Ford County joins this litigation, greatly expanded the class allegations, and implicates complex matters of federalism and State sovereignty. Kansas’s Motion for Limited Intervention (Doc. ##) and supporting suggestions (Doc. ##) briefly discuss the significant legal issues Ford County’s involvement raises.

This motion is made in good faith under belief Ford County’s litigation challenges the sovereign authority of the State of Kansas—and *every* State—and necessitates significant legal analysis of jurisdiction, standing, venue, and class representation. Given Kansas’s significant interest in protect its sovereignty in this action, good causes exists for Kansas to exceed the Courts’ page limitations.

In accordance with the Court’s expectations of adherence to the Tenets of Professional Courtesy (*see* Doc. 75), Kansas sought informal agreement for its request to exceed page limitations with plaintiffs’ counsel on [DATE]. Plaintiffs’ counsel advised they would [OPPOSE/NOT OPPOSE] Kansas’s motion.

For these reasons, Kansas respectfully requests this Court grant its motion for leave to exceed page limits.

Dated: [DATE]

Respectfully submitted,

KRIS W. KOBACH
Attorney General of Kansas

/s/ Nicholas C. Smith

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CERTIFICATE OF SERVICE

I hereby certify that on this [] day of [] 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have entered an appearance, and I otherwise caused all parties to be served with the foregoing document as required by Federal Rule of Civil Procedure 24(c).

/s/ Nicholas C. Smith

Nicholas C. Smith